

THE HONORABLE BENJAMIN SETTLE

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT TACOMA

CLYDE RAY SPENCER , MATTHEW RAY  
SPENCER, and KATHRYN E. TETZ,

Plaintiffs,

v.

FORMER DEPUTY PROSECUTING  
ATTORNEY FOR CLARK COUNTY  
JAMES M. PETERS, DETECTIVE  
SHARON KRAUSE, SERGEANT  
MICHAEL DAVIDSON, CLARK COUNTY  
PROSECUTOR'S OFFICE, CLARK  
COUNTY SHERIFF'S OFFICE, THE  
COUNTY OF CLARK and JOHN DOES  
ONE THROUGH TEN,

Defendants.

NO. C11 5424 BHS

DECLARATION OF GUY  
BOGDANOVICH IN SUPPORT OF  
DEFENDANT SHARON  
KRAUSE'S SECOND MOTION  
FOR SUMMARY JUDGMENT

NOTE ON MOTION CALENDAR:  
Friday, February 8, 2013

PURSUANT TO 28 U.S.C. § 1746, Guy Bogdanovich declares as follows:

1. I am competent to testify in all respects, and make this declaration from personal knowledge. I am the attorney of record for defendant Sharon Krause in the above-entitled action.

2. Attached hereto as **Exhibit A** is a true and correct copy of the title and signature pages to Plaintiffs' First Set of Interrogatories to Defendant Sharon Krause and Answers Thereto, and the pages containing the answer to Interrogatory No. 18.

DECLARATION OF GUY BOGDANOVICH  
IN SUPPORT OF DEFENDANT SHARON  
KRAUSE'S SECOND MOTION FOR SUMMARY  
JUDGMENT - 1

Cause No: C11-5424 BHS

LAW, LYMAN, DANIEL,  
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2674 RW JOHNSON BLVD SW, TUMWATER, WA 98512  
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(360) 754-3480 FAX: (360) 357-3511

1           3. Attached hereto as **Exhibit B** is a true and correct copy of the title page,  
2 Exhibit 5, and the following pages from the Deposition of James Davidson: 16-20, 37-  
3 38 and 47-48 (and applicable correction sheet).

4           4. Attached hereto as **Exhibit C** is a true and correct copy of the title page,  
5 Exhibit B, and following pages from the Deposition of Shirley Spencer: 23-51, 102-103,  
6 122-123 and 144-146.

7           5. Attached hereto as **Exhibit D** is a true and correct copy the title page,  
8 Exhibits 1, 2, 8 and 14, and the following pages from the Deposition of Sharon Krause:  
9 9-19, 26-27, 29-31, 34-36, 60-62, 75-80, 87-106, 134-137 and 195-197 (and applicable  
10 correction sheet).

11           6. Attached hereto as **Exhibit E** is a true and correct copy of the title page and  
12 following pages from the Deposition of Clyde Ray Spencer: 7-11.

13           7. Attached hereto as **Exhibit F** is a true and correct copy of the title page and  
14 following pages from the Deposition of Rebecca Roe: 84, 95-96 and 195-197.

15           8. Attached hereto as **Exhibit G** is a true and correct copy of the title page and  
16 the following pages from the Deposition of Arthur Curtis: 26-29, 67-75 and 94 (and  
17 applicable correction sheet).

18           9. Attached hereto as **Exhibit H** is a true and correct copy of the sworn report  
19 of Phillip W. Esplin, Ed.D., Psychologist, produced by defendants as part of their expert  
20 witness disclosure..

21           10. Attached hereto as **Exhibit I** is a true and correct copy of the title page and  
22 following pages from the Deposition of William Bernet, M.D.: 11, 13-21, 25-26, 28-39,  
23 44-46, 48-49, 51-52, 55-65, 67-68, 80-83, 85, 87-89, 96-99, 100-101, 112, 136-138, 140  
24 and 143-153.

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**DECLARATION OF GUY BOGDANOVICH  
IN SUPPORT OF DEFENDANT SHARON  
KRAUSE'S SECOND MOTION FOR SUMMARY  
JUDGMENT - 2**

Cause No: C11-5424 BHS

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1 11. Attached hereto as **Exhibit J** is a true and correct copy of the title page and  
2 following pages from the Deposition of DeAnne Spencer: 27-30, 33-35, 94-95, 108-109  
3 and 152-155.

4 12. Attached hereto as **Exhibit K** is a true and correct copy of the title page and  
5 following pages from the Deposition of Kathryn Tetz: 34-35.

6 13. Attached hereto as **Exhibit L** is a true and correct copy of the title page,  
7 Exhibit 3, and the following pages from the Deposition of Matthew Spencer: 89-92 and  
8 100-102.

9 14. Attached hereto as **Exhibit M** is a true and correct copy of the title page and  
10 following pages from the Deposition of James Peters: 114-115, 156-157, 169-171, 173-174  
11 and 259-260.

12 I declare under penalty of perjury under the laws of the State of Washington and  
13 the United States of America that the foregoing is true and correct.

14 DATED this 16<sup>th</sup> day of January, 2013 at Tumwater, Washington.

15  
16 /s/ Guy Bogdanovich

17 Guy Bogdanovich  
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**DECLARATION OF GUY BOGDANOVICH  
IN SUPPORT OF DEFENDANT SHARON  
KRAUSE'S SECOND MOTION FOR SUMMARY  
JUDGMENT - 3**

Cause No: C11-5424 BHS

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